

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

JIM TRAKAS,

Plaintiff,

v.

**CONSERVATIVE ALLIANCE
POLITICAL ACTION COMMITTEE, ET
AL.,**

Defendants.

:
:
: **Case No. 1:18-cv-1798**
:
: **Judge Donald C. Nugent**
:
:
:
:
:
:

DECLARATION OF CHRIS MARSTON

I, Chris Marston, declare under penalty of perjury as follows:

1. I am the Treasurer of Conservative Alliance Political Action Committee (“CAPAC”), the Defendant in this action.
2. CAPAC is a political action committee whose office is located in Alexandria, Virginia.
3. Exhibits 1-5 to this declaration contain true and accurate copies of the five print advertisements that are the subject of the Complaint of Plaintiff Jim Trakas. In addition, CA PAC disseminated a television commercial and a radio commercial in opposition to Trakas’ primary candidacy. Both print and broadcast advertisements were disseminated in the weeks leading up to Ohio’s May 8, 2018, primary election, in which Trakas was one of two candidates seeking the Republican Party nomination for the general election for a seat on the Ohio House of Representatives, District 6. CAPAC disseminated

EXHIBIT

A

exhibitstickers.com

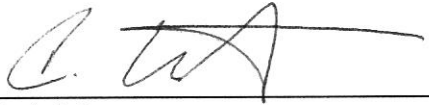
advertisements criticizing Trakas because he had a conservative opponent in the Republican primary.

4. To produce the advertisements, CAPAC engaged vendors – the Stoneridge Group, based in Georgia, and Nick Everhart, a political consultant based in Columbus.

5. I have no reason to believe that any of the statements contained in the ads are untrue.

6. I declare under penalty of perjury that the foregoing is true and correct and based upon my personal knowledge.

Executed on October 30, 2019.


Chris Marston

1178-001:835359

JIM TRAKAS DESCRIBING HIS FOR-PROFIT ONLINE CHARTER SCHOOL:

The Columbus Dispatch

“...this is a cash cow... I’m not sure
we’re educating anybody.”

March 5, 2016



EXHIBIT

A-1

exhibitstick.com



SHAMEFUL JIM TRAKAS: ENRICHING HIMSELF AT OUR KIDS' EXPENSE

“...this is a
cash cow...
I’m not
sure we’re
educating
anybody.”

– *Politician Jim Trakas*
March 5, 2016

Jim Trakas is another self-serving politician.

When Jim Trakas took a break from seeking elected office, he served as chairman of the board of an online charter school called Provost Academy. A state audit found that the online learning school OVERBILLED the state of Ohio by \$800,000.

That’s \$800,000 of your tax dollars lining their pockets!

What’s worse is Trakas knew it. He was secretly recorded describing the school.

But while Trakas was livin’ it up on our dime, our kids were left with hopelessness in their education.

**Enriching Himself. Hurting our Kids.
Those are the facts About Jim Trakas.**



VOTE **NO** ON JIM TRAKAS ON MAY 8TH

CONSERVATIVE ALLIANCE PAC
3136 KINGS DALE CENTER, P.O. BOX #136
UPPER ARLINGTON, OH 43221

EXHIBIT

A-2

PRSR STD
US Postage

PAID
Mailworks,
Inc.

PSSST...



Here's a Little Secret About

TAXIN'
JIM TRAKAS





**JIM TRAKAS' SECRET IS OUT:
HE SCAMMED US BEFORE,
NOW HE WANTS TO DO IT AGAIN!**



**MILKING THE
TAXPAYER**

Jim Trakas has been running for and holding elective office for more than two decades where he has collected hundreds of thousands in taxpayer-funded salary. He even steered a million in tax payer dollars to his charter school, which he called a "cash cow."⁽¹⁾



**SENDING
TAXES
SKYROCKETING**

Taxin' Jim Trakas officially pledged to never raise taxes, BUT he did! He raised taxes on gas and fees for licenses and registrations by \$577 Million and raised the sales tax by 20%. Taxin' Trakas wasn't done until he increased taxes by more than \$3 billion.⁽²⁾



**WORKING FOR CORRUPT COLUMBUS
INSIDERS, NOT US**

Jim Trakas' campaign is being backed by the corrupt former Ohio Speaker who was investigated for taking illegal kickbacks and who was investigated by the Feds. Trakas is beholden to him and his interests, not Cuyahoga County families.⁽³⁾

**DON'T BUY THE LIE!
NOT THIS TIME!
JIM TRAKAS IS IN IT
FOR HIMSELF.**



**VOTE NO
ON JIM
TRAKAS
ON MAY 8TH**

Paid for by Conservative Alliance PAC
Not Authorized by any Candidate or Candidates Committee
(216) 931-0038

POLITICIAN JIM TRAKAS
IS BEING PROPPED UP BY A CAREER
POLITICAL INSIDER FROM COLUMBUS
WHO WAS INVESTIGATED FOR:

☒ **HIJACKING
ELECTIONS**

☒ **KICKBACKS AND
SKIMMING MONEY**

☒ **SHADY
FINANCIAL
DEALINGS**

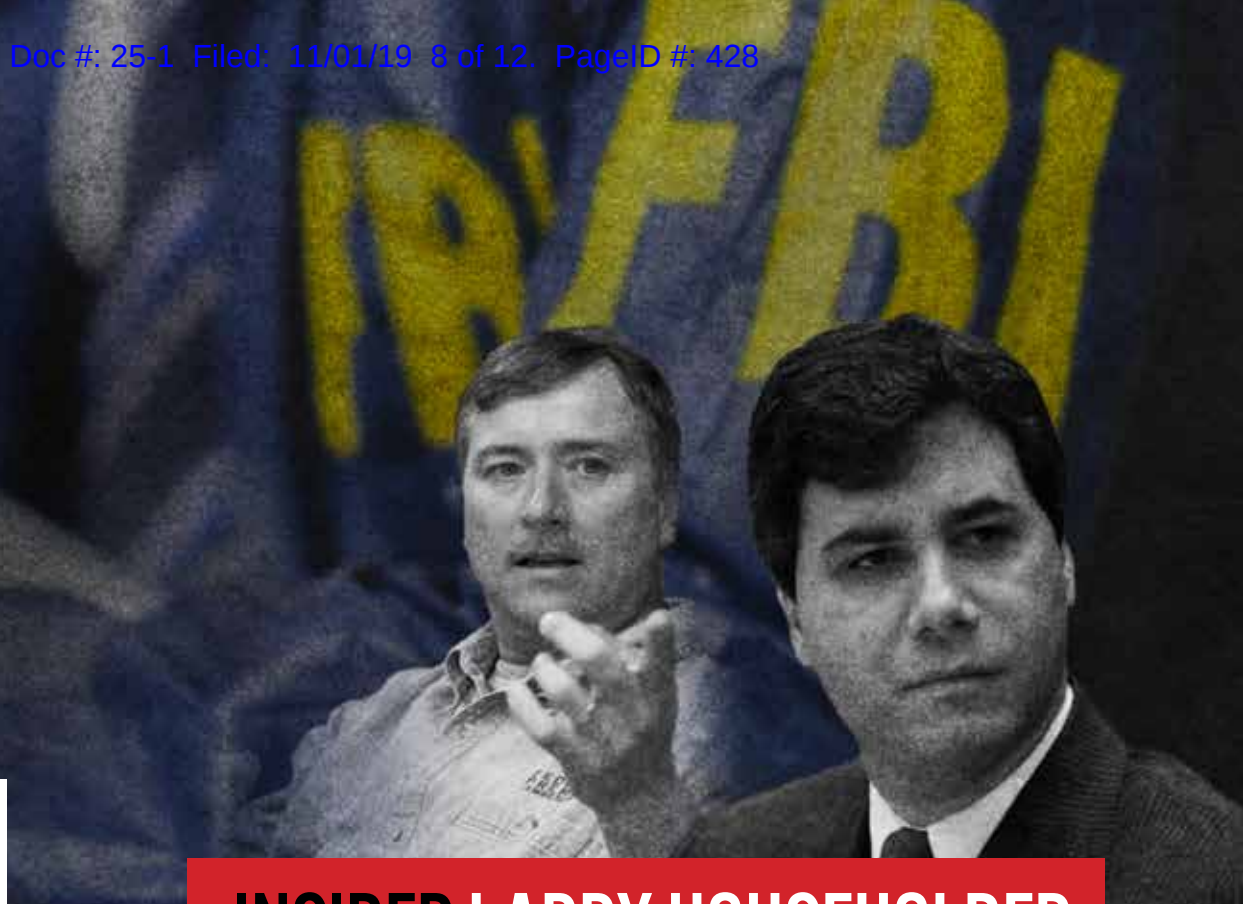
☒ **TRADING LEGISLATION
FOR CAMPAIGN
CONTRIBUTIONS**

EXHIBIT

A-3

exhibitsticker.com

JIM TRAKAS: BANKROLLED BY THE COLUMBUS SWAMP. OWNED BY THE COLUMBUS SWAMP.



Former Ohio House Speaker Larry Householder was **under investigation by the FBI for taking kickbacks and illegally pocketing campaign contributions.** But just like Hillary Clinton, the FBI let him off the hook.

Now Larry Householder is plotting a political comeback by getting his old crony Jim Trakas back into office as State Representative.

Larry Householder is Jim Trakas' biggest supporter because Trakas will do nothing to stop his agenda – just like Trakas did when he **voted for Householder's \$3 billion tax hike!** (HB 95, 2003)

**INSIDER LARRY HOUSEHOLDER
AND CRONY JIM TRAKAS:**

**IN IT FOR THEMSELVES -
NOT CUYAHOGA COUNTY.**

That's why **Cuyahoga County families can't trust Jim Trakas.** He'll back corrupt Larry Householder and the Columbus insiders, not us.

CONSERVATIVE ALLIANCE PAC
3136 KINGSDALE CENTER, P.O. BOX #136
UPPER ARLINGTON, OH 43221

EXHIBIT

A-4

exhibits.ticker.com

PRSR STD
US Postage

PAID
Stoneridge
Group

JIM TRAKAS JACKED OUR TAXES UP BY
\$3 BILLION!

NOW HE IS RUNNING FOR STATE REPRESENTATIVE AGAIN!



TAXIN' JIM TRAKAS **SHOCKING \$3 BILLION** TAX INCREASE



OH NO!
TAXIN' JIM TRAKAS...
NOT AGAIN!

JIM TRAKAS IS A PERFECT EXAMPLE OF A CAREER POLITICIAN.

TAXIN' JIM TRAKAS LOVES TO CLAIM HE IS FOR LOWER TAXES -- BUT SERVING AS STATE REPRESENTATIVE PREVIOUSLY *HE VOTED TO INCREASE TAXES BY MORE THAN \$3 BILLION.*⁽¹⁾

THAT'S RIGHT! RATHER THAN FIND WAYS TO CUT GOVERNMENT SPENDING, JIM TRAKAS RAISED SALES TAXES BY 20% - STICKING OHIO'S WORKING FAMILIES WITH \$3 BILLION IN HIGHER TAXES.

IF JIM TRAKAS LIED TO US AND RAISED OUR TAXES, HOW CAN OHIO FAMILIES TRUST HIM NOW? **THEY CAN'T!**

VOTE NO ON TAXIN' TRAKAS
-- HE COSTS US TOO MUCH!



EXHIBIT

A-5

PRSRT STD
US Postage
PAID
Stoneridge
Group



**A TAX
INCREASE
HERE**

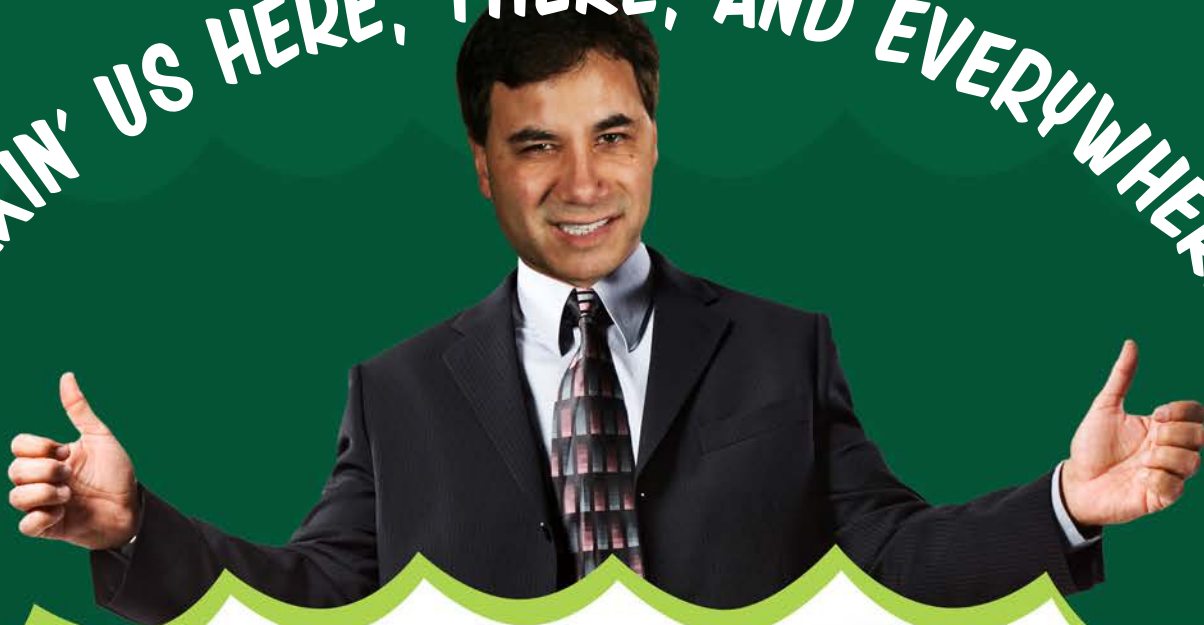
**A TAX
INCREASE
THERE**



**JIM TRAKAS'
TAX INCREASES ARE
EVERYWHERE!**

TAXIN' JIM TRAKAS

TAXIN' US HERE, THERE, AND EVERYWHERE



Career politician Jim Trakas has been running for office for more than 20 years. And over that time, Taxin' Trakas has voted to raise our taxes higher and higher.



**"SOME OF THE LARGEST
STATE TAX INCREASES IN
THE NATION."**

(www.cbpp.org, 11/25/2003)

In 2003, as State Representative, Jim Trakas **voted to raise sales taxes by 20%** - driving up the costs of everything we buy. (HB 95, 2003)

- X Higher taxes on clothing – YUP!**
- X Higher taxes on gas – YOU BET!**
- X Higher taxes on diapers – ABSOLUTELY!**

Taxin' Trakas loved hiking our taxes so much that he didn't stop until racked up \$3 BILLION in higher taxes on Ohio families and businesses. (HB 95, 2003)

**\$3 BILLION IN HIGHER TAXES. 20% HIKE IN SALES TAXES.
TAXIN' TRAKAS COSTS TOO MUCH!**

VOTE NO ON TAXIN' JIM TRAKAS ON MAY 8TH!